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12  
13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

20 **Debtors.**

21  Affects PG&E Corporation  
22  Affects Pacific Gas and Electric Company  
23  Affects both Debtors

24 \*All papers shall be filed in the Lead Case,  
25 No. 19-30088 (DM)

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**FIRST SUPPLEMENTAL VERIFIED  
STATEMENT OF CECILY A. DUMAS  
IN SUPPORT OF THE APPLICATION  
OF THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS PURSUANT TO 11  
U.S.C. § 1103 AND FED. R. BANKR. P.  
2014 AND 5002, FOR AN ORDER  
AUTHORIZING RETENTION AND  
EMPLOYMENT OF BAKER &  
HOSTETLER, LLP, EFFECTIVE AS OF  
FEBRUARY 15, 2019**

1 CECILY A. DUMAS, under penalty of perjury, declares:

2 1. I am a partner in the Financial Restructuring Group of Baker & Hostetler, LLP  
3 (“**Baker**” or the “**Firm**”), counsel to the Official Committee of Tort Claimants (the “**Committee**”)  
4 of PG&E Corporation (the “**Holding Company**”) and Pacific Gas and Electric Company (the  
5 “**Utility**,” and collectively with the Holding Company, the “**Debtors**”) in these chapter 11 cases  
6 (the “**Cases**”).

7 2. I submit this First Supplemental Verified Statement (“**First Supplemental  
Statement**”) pursuant to section 1103(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-  
8 1532 (as amended, the “**Bankruptcy Code**”), and Rules 2014 and 5002 of the Federal Rules of  
9 Bankruptcy Procedure (the “**Bankruptcy Rules**”). This First Supplemental Statement updates  
10 Baker’s disclosures of connections set forth in the “**DECLARATION OF CECILY A. DUMAS  
IN SUPPORT OF THE APPLICATION OF THE OFFICIAL COMMITTEE OF TORT  
CLAIMANTS PURSUANT TO 11 U.S.C. § 1103 AND FED. R. BANKR. P. 2014 AND 5002, FOR  
AN ORDER AUTHORIZING RETENTION AND EMPLOYMENT OF BAKER & HOSTETLER,  
LLP, EFFECTIVE AS OF FEBRUARY 15, 2019**” (the “**2014 Statement**”).

11 3. Unless otherwise stated in this First Supplemental Statement, I have knowledge of  
12 the facts set forth herein and, if called as a witness, I would testify thereto. Certain of the  
13 disclosures set forth herein relate to matters not within my personal knowledge, but rather within  
14 the personal knowledge of other attorneys and employees at Baker and are based on information  
15 provided by them to me.

16 **Background**

17 4. On January 29, 2019 (the “**Petition Date**”), the Debtors filed voluntary petitions  
18 for relief under chapter 11 of the Bankruptcy Code (the “**Cases**”) in the United States Bankruptcy  
19 Court for the Northern District of California (the “**Court**”). On January 31, 2019, the Court entered  
20 an order consolidating the Cases for joint administration [ECF 207].

21 5. The Debtors continue to manage their assets and operate their businesses as  
22 debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee  
23 has been appointed in the Cases.

6. On February 15, 2019, the Office of the United States Trustee (“U.S. Trustee”) filed an Appointment of the Official Committee of Tort Claimants [ECF 453]. Following the resignation of Richard Heffern from the original committee and the addition of Tommy Wehe, on February 21, 2019, the U.S. Trustee filed the Amended Appointment of the Official Committee of Tort Claimants [ECF 530]. The members of the Committee are: (i) GER Hospitality, LLC, in its capacity as an individual claimant; (ii) Kirk Trostle; (iii) Tommy Wehe; (iv) Angelo Loo; (v) Karen K. Gowins; (vi) Agajanian, Inc.; (vii) Susan Slocum; (viii) Samuel Maxwell; (ix) Karen Lockhart; (x) Wagner Family Wines-Caymus Vineyards; and (xi) Gregory Wilson.

7. The Committee conducted a meeting on February 15, 2019, at which the Committee duly selected Baker as counsel to represent it during the pendency of the Cases. The Court approved Baker's employment as counsel to the Committee by order dated April 10, 2019 [ECF 1331].

## **Supplemental Disclosures**

8. Approximately 17 years ago, in 2001, the Utility's predecessor commenced chapter 11 case no. 01-30923 ("First Bankruptcy Case") and confirmed a plan of reorganization in that case in 2003. The Firm makes the following supplemental disclosures concerning connections of attorneys of the Firm relating to the First Bankruptcy Case prior to such attorneys' affiliation with the Firm.<sup>1</sup>

9. In 2008, Friedman & Springwater LLP f/k/a Friedman Dumas & Springwater LLP (“F&S”), was engaged by the reorganized debtor in the First Bankruptcy Case to assist it in connection with an attorney fee dispute with Travelers Casualty & Surety Co. of America. I assisted F&S in the Travelers engagement, and, to the best of my recollection given the intervening decade, billed fewer than 25 hours to the matter. In addition to the foregoing, and based upon my recollection, F&S may have represented the reorganized Utility in non-public matters that are wholly unrelated to these Cases at or about the same time as the foregoing representation. F&S’s

<sup>1</sup> In connection with my transition to the Firm from Pillsbury Winthrop Shaw Pittman LLP in early 2019, I was required to re-register with the Court’s electronic filing system, also known by the shorthand of “CM/ECF.” Pursuant to the CM/ECF procedures, my assistant prepared numerous notices to be removed from the CM/ECF notification list for inactive matters, including the First Bankruptcy Case. The re-registration process triggered a notice for removal of my name as counsel to PG&E in that case.

engagement with respect to the fee dispute was concluded before the San Bruno gas pipeline explosion and all the wildfires caused by the Debtors, and it preceded the filing of these Cases by a decade. I concluded my affiliation with F&S in 2012.

10. In the First Bankruptcy Case, PG&E Corporation (which did not file for bankruptcy) was represented by Dewey Ballantine LLP (“Dewey”) as co-counsel to Weil Gotshal & Manges LLP. Jorian Rose, a partner of Baker who is currently assisting the Firm in representing the Committee, was employed by Dewey as a junior associate and performed assignments in connection with the anticipated filing by the Utility. Mr. Rose left Dewey around the time the First Bankruptcy Case. Given the intervening 17 years, Mr. Rose has no specific recollection of the assignments he may have worked on while at Dewey in connection with the First Bankruptcy Case.

11. Jerry Bloom, Counsel to the Firm, as a partner of White & Case, represented Delta Power, the co-chair of the official committee of unsecured creditors in the First Bankruptcy Case. Milbank Tweed Hadley & McCloy LLP, which represents the Official Committee of Unsecured Creditors in these Cases, also represented the committee in the First Bankruptcy Case.

12. To the best of my knowledge, no other attorneys of Baker participating in the Firm's representation of the Committee worked on the First Bankruptcy Case or represented the Debtors or their predecessors in either instance while affiliated with a prior firm.

13. In addition to the foregoing, the Debtors have identified Burns & McDonnell Engineering Inc as a vendor in these Cases. A Baker partner now represents Burns & McDonnell Engineering Company Inc. in unrelated matters.

## **Baker's Disinterestedness**

14. To the best of my knowledge and except as otherwise set forth in my first declaration and herein, the partners, counsel, associates and employees of Baker: (i) do not have any connection with the Debtors, their known creditors, other known or potential parties in interest, their respective attorneys or accountants or other professionals, the U.S. Trustee for Region 17 or any person employed in the San Francisco office of the U.S. Trustee, or any United States

1 Bankruptcy Judge for the Northern District of California; and (ii) do not represent any other entity  
2 having an adverse interest in connection with these Cases.

3  
4 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true  
and correct.*

5  
6 Executed on May 14, 2019

7 /s/ Cecily A. Dumas  
8 Cecily A. Dumas

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BAKER & HOSTETLER, LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO, CA